



# INTERNAL AUDIT

## SUBSTANTIVE TESTING

### FIRE / EMS

March 4, 2002

Roanoke City Council Audit Committee  
Roanoke, Virginia

We have completed our audit of the Fire Marshal's Inspection Program. Our audit was performed in accordance with generally accepted government auditing standards.

#### **BACKGROUND**

The Fire Marshal's office is part of the Fire/EMS department and is a key component of department's proactive fire fighting philosophy. The primary mission of the Fire Marshal's office is to protect life and property from fire and explosion through prevention efforts. The office inspects local businesses and enforces the fire code, reviews building plans for fire code compliance, issues explosives permits, performs suppression and fire system tests, and satisfies any other requests for prevention services.

The Fire Marshal's office reorganized in March 2000 in an effort to increase the quantity and quality of fire inspections. The reorganization provided for a staff of six part-time Fire Inspectors dedicated solely to performing fire safety inspections. The Fire Marshal's office transferred duties for providing education, performing building plan reviews, and for performing fire investigations to other dedicated staff.

The Fire Marshal's inspection program established a goal to inspect each commercial facility in the City once a year. Facilities with more vulnerable occupants such as public schools and nursing homes are to be inspected on a more frequent basis, such as quarterly or semi-annually. The goals established by the City of Roanoke's Fire Marshal's office exceed the requirements established under the Virginia Statewide Fire Prevention Code and Virginia law. The State requires only certain types of facilities to be inspected and allows localities the option of having the State Fire Marshal's office perform the inspections. The City of Roanoke has chosen to perform the inspections based on the importance of an inspection program to their overall program of proactive fire fighting.

The Fire Marshal's office recently initiated a new "postcard" procedure to improve compliance and to make more time available to perform initial inspections. Minor violations such as empty boxes partially obstructing doorways once required a second on-site inspection. Fire Safety Inspectors can now document minor violations on a

preprinted, self-addressed, two-part postcard. The building occupant has 30 days to correct the violation and sign-off on the post card attesting that the correction has been made. He or she then mails the post card back to the Fire Marshal's office where it is matched up with the Inspector's copy and filed. Every tenth card returned is verified by a follow up inspection. If the post card is not returned within 30 days, the Inspector returns to the building to re-inspect it and to verify that the corrections have been made. This program reduces the number of re-inspections required and as a result provides time for more initial inspections.

## **PURPOSE**

The purpose of this audit was to verify that fire safety inspections are being conducted as required by State and Local law and that violations are properly addressed and followed-up on.

## **SCOPE**

Our audit included a review of processes in place as of November 1, 2001. Our test work primarily focused on data from January 1, 1996 to November 1, 2001.

## **METHODOLOGY**

We gained an understanding of the Fire Marshal's processes and procedures through reviews of existing documentation and interviews with Fire/EMS employees and management. We also reviewed City Code and the Virginia Statewide Fire Prevention Code. Accordingly, we developed tests to determine if inspections are being performed at intervals required by law and by departmental goals. We also tested the postcard program to determine if postcards are being returned and follow-up inspections performed as required. We tested the accuracy of information by selecting a sample of records on a judgmental basis.

## **RESULTS**

Our testing indicates that the postcard program is being used as intended and is being effectively managed, with responses on file and follow-up inspections being performed as required. Our testing also indicates that the Fire Marshal's office performs required follow-up inspections on fire code violations. The following concerns were discussed with management based on the results of our audit:

### **Finding 01**

The Fire Marshal's office does not have procedures established to ensure required fire safety inspections are completed within the time frame required under the Virginia Statewide Fire Prevention Code (SFPC). Inspection files are typically organized by street rather than business and scheduling naturally tends towards working a file rather than prioritizing by business. Inspection histories are all paper based and there are no automated processes for maintaining history or scheduling. In a sample of 25 businesses requiring annual inspections, we noted four (16%) had not been inspected

within the last 12 months at the time of the audit. All four businesses were assisted living facilities.

Section F-109.3 of the Virginia SFPC requires annual inspections of residential care facilities, adult care residences, student residence facilities owned or operated by public institutions of higher education in the Commonwealth, and public schools in the Commonwealth.

### **Recommendation 01**

Based on discussions with the Fire Marshal's office we recommend they implement their plan to establish a filing system based on tax map number and current occupancy. This makes it easier to maintain an accurate inspection history of both the building and the occupant. The Fire Marshal's office also plans to assign dedicated personnel to maintaining the files rather than using light duty personnel that frequently change and may be inconsistent in how they maintain files. We also recommend that methodology be developed and procedures documented to provide a structured, comprehensive approach to scheduling inspections. The Fire Marshal's office is currently negotiating the purchase of Print Trac's Management Information System, which should include a filing and scheduling component for fire inspections.

### **Management's Response 01**

The Fire Marshal's office has now inspected those facilities noted in the audit as past due for inspection. We agree with the recommendation and have implemented the following changes:

- Poster boards are now being used to aid in tracking the status of inspections of all schools and adult care residences.
- A better filing protocol is in place, with the elimination of light duty personnel from filing duties.
- Increased contact has been established with the State Fire Marshal's office for licensing inspections.
- Plans are being made to computerize record keeping.

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### **Finding 02**

In a sample of 40 local businesses selected from the yellow pages, we found that 20 (50%) had not been inspected within the time frames established by the department.

- 5/10 (50%) of 90-day cycle inspections are not current.
- 4/10 (40%) of 180-day cycle inspections are not current.

- 11/20 (55%) of Annual cycle inspections are not current.

As in finding number one, the organization of the files and the scheduling methodology are the main issues contributing to the office not meeting its goals.

### **Recommendation 02**

The Fire Marshal's office has already taken steps to increase efficiency with programs such as the postcard system for minor violations. As in recommendation one, the Fire Marshal's office will be changing the filing system and pursuing a filing and scheduling software as part of the negotiations with Print Trac. Depending on the time line for implementing the software, it may be worthwhile for the Fire Marshal's office to develop a simple database for managing inspection scheduling.

### **Management's Response 02**

Prior to the reorganization of the Fire Marshal's Office in March 2000, most business facilities were inspected within a five-year period. Often the time between inspections extended well beyond that time frame. There has been a substantial improvement in the Fire Marshal's ability to meet the community service needs by:

- Annual inspections that realistically approach the desired goal of a fire safe and educated business community that is vigilant toward fire safety issues.
- Recognition of the need for more frequent inspections in specific segments of the business community.

Each category of inspections has unique peculiarities that require different approaches to the inspection process. The main goal of the inspection program is to annually inspect all commercial facilities to which the SFPC applies. We estimate that there are approximately 6,000 such facilities in the City.

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### **Finding 03**

The typical inspection process consists of an initial inspection, a thirty-day period to allow for compliance with codes, and then a re-inspection. If a business has complied with the fire codes, no further action is taken; if not, a third inspection is needed. City Council's fee compendium allows a re-inspection fee to be assessed for the third inspection and each subsequent inspection necessary to ensure compliance.

City resolution 30124 requires that fees for special services should approximate the cost of such services. The current fee of \$27 for fire safety re-inspections has not been reviewed or adjusted since 1990. We estimate that the current cost of labor to provide a follow-up fire safety inspection to confirm violations have been corrected is conservatively \$37. Also, we noted that the fire safety inspection fee was not assessed in some cases when a follow-up inspection was performed.

**Recommendation 03**

Based on our discussions with the Fire Marshals' office, it is their intent to raise awareness in the business community to expect annual inspections. They intend to implement a policy that provides for a free initial inspection and one free follow-up to verify corrections. If a business requires a second follow-up inspection, a fee will then be assessed. The Fire Marshal's office plans to develop procedures that will assign the responsibility for billing and collecting the inspection fee to a position other than the Inspectors. We also recommend their policies include a provision for reviewing the fire safety inspection fee every three to five years to determine if the fee covers the cost of the inspection.

**Management's Response 03**

Some Inspectors have been hesitant to assess fees because they erroneously perceived the fee to be a fine. Each case is different and there can be extenuating circumstances such as special order parts that take longer than 30 days to receive. This has led to inconsistency in our assessing the fee. We have been re-educating inspectors on the guidelines for assessing fees and future fees will be levied consistent with the guidelines.

The Fire Marshal's office agrees that the fee should be adjusted to reflect the true costs of the re-inspection and will propose an adjustment in the 2002/2003 budget.

**CONCLUSION**

Based on the results of the audit, we conclude that the Fire Marshal's office has not been able to conduct the fire safety inspections within the time frames required by State and local law, or their departmental goals. The office has consistently followed-up on noted violations of the fire safety code.

We applaud the Fire Marshal's office for establishing ambitious goals relating to Fire Safety Inspections and continuing to work towards those goals rather than retreating from them. We thank the Fire/EMS department for their cooperation and assistance during this audit.

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